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December 9, 2019

VIA ECF

The Honorable Steven C. Mannion, U.S.M.J.
United States District Court
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, New Jersey 07102

Re: *Shire US, Inc. v. Allergan, Inc., Allergan Sales, LLC, and Allergan USA, Inc.*
Civil Action No. 17-7716 (JMV)(SCM)

Dear Judge Mannion:

This firm, together with Haug Partners LLP, represents Plaintiff in the above-referenced matter. Plaintiff and Defendants Allergan, Inc., Allergan Sales, LLC, and Allergan USA, Inc. (collectively "Allergan") hereby jointly submit this letter regarding the status teleconference the Court scheduled for December 16, 2019 at 10:00 a.m. (D.I. 98).

The parties have agreed to the following joint agenda, which lists issues that could be discussed with Your Honor, pursuant to the Court's Pretrial Scheduling Order (D.I. 36), the March 12, 2019 Text Order (D.I. 74), and the Court's Order for Stay and Administrative Termination (D.I. 92):

1. The parties are in discussions to potentially resolve the case.
2. The parties have nearly completed briefing on Allergan's motion to dismiss the Second Amended Complaint, and Allergan's reply memorandum in support of its motion is presently due to be served on Plaintiff on December 18, 2019.
3. The Court ordered that Plaintiff shall file a letter by December 27, 2019 requesting to either restore this matter to the active list or extend the stay/termination.
 - a. Plaintiff believes that the litigation should not be resumed at this time, and as of now intends to request an extension of the stay/termination.
 - b. Allergan agrees that the litigation should not be resumed at this time.

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The parties look forward to discussing the above issues and any other issues that Your Honor wishes to address. Thank you for Your Honor's kind attention to this matter.

Respectfully yours,

A handwritten signature in blue ink that reads "William C. Baton". The signature is written in a cursive, flowing style.

William C. Baton

cc: Counsel of Record (via e-mail)